IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,

ν.

Plaintiff,

MICHAEL PROTACK,

Defendant.

Criminal Action No. 21-

REDACTED

INDICTMENT

The Grand Jury for the District of Delaware charges that:

COUNT I

On or about January 5, 2021, in the District of Delaware, MICHAEL PROTACK, the defendant, knowingly and willfully did deposit in an authorized depository for mail matter to be sent and delivered by the U.S. Postal Service, and caused to be delivered by the U.S. Postal Service according to the directions thereon, a communication addressed to another person containing a threat to injure the addressee, in violation of Title 18, United States Code, Section 876(c).

COUNT II

On or about February 25, 2021, in the District of Delaware, MICHAEL PROTACK, the defendant, knowingly and willfully did deposit in an authorized depository for mail matter to be sent and delivered by the U.S. Postal Service, and caused to be delivered by the U.S. Postal Service according to the directions thereon, a communication addressed to another person containing a threat to injure the addressee, in violation of Title 18, United States Code, Section 876(c).

A TRUE BILL:

Foreperson

DAVID C. WEISS

UNITED STATES ATTORNEY

Rw.

Briana M. Knox

Assistant United States Attorney

Dated: June 10, 2021